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March 15, 2008

Judge Louis L. Stanton  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

Re: USA v. Robert L. Harding et al  
Index no. 07-5924  
Discovery – Status report

Dear Judge Stanton:

This letter is respectfully submitted to provide a status update on the discovery process in this case and to request that the Court so-order the schedule set forth below.

Status of Discovery

Since the last report on January 31, 2008, my clients have filed the amended complaint and responded to plaintiff's interrogatories, as well as plaintiff's document request.

Some of the items in the document request remain to be provided, including the filing of tax returns for certain years. The remainder of this information is expected to be provided on or before March 31, 2008. My clients have sent an additional document request to the plaintiff and documents are expected to be provided no later than April 15, 2008.

Proposed Schedule

In light of the delays in finalizing production of documents, the parties request that the Court so-order the following schedule.

Depositions to be complete by June 15, 2008

Requests to Admit served no later than July 1, 2008

Motions for summary judgment served no later than August 1, 2008

The parties also request that the pretrial conference currently scheduled for April 11, 2008, be adjourned to June 27, 2008. In addition, the parties request that the time to submit the next status letter be extended to April 30, 2008.

The parties believe that this schedule will permit them to complete discovery and to attempt to reach a settlement of this case.

Counsel for the government consents to the above timetable.

Respectfully,

/s/ M. Bradford Randolph

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